

Claimant was not included on the Debtor's Matrix of Creditors or any amendments of same. Claimant lacked actual or constructive notice of the filing of the petition or of the Bar Date prior to the Bar Date. Claimant was never served with a copy of the 341 Notice or notice of the Bar Date. Thus, Claimant should be permitted to assert a claim as a lawful creditor at this time.

WHEREFORE, Claimant respectfully requests this Honorable Court enter an Order granting leave to file the proposed Proof of Claim submitted herewith.

Date: April 13, 2011

Respectfully submitted,
Christopher Cavallaro,
By his Attorneys,

/s/Jay M. Wolman

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CERTIFICATE OF SERVICE

I, Jay M. Wolman, counsel for Claimant, hereby certify that a true copy of the foregoing document was served upon counsel for Debtor and the Office of the U.S. Trustee, by CM/ECF filing this 13th day of April 2011.

/s/Jay M. Wolman

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